

## REMARKS

### **I. INTRODUCTION**

Favorable reconsideration of this application, in light of the present amendments and following discussion, is respectfully requested.

### **II. STATUS OF THE CLAIMS**

Claims 1-24 are pending. By the present amendment, Claims 1-11 are amended, and Claims 12-24 are new. As support for the amendments to Claims 1-24 may be found, at least, in the specification and figures, it is respectfully submitted that no new matter is added by this amendment.

### **III. SUMMARY OF THE OFFICE ACTION**

In the outstanding Office Action, Claims 1-11 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention; Claims 1-11 are rejected under 35 U.S.C. § 101 because the claims are drawn to a system but fail to recite any structural limitations of the system; Claims 1, 5, and 8-10 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publ. No. US 2003/0100973 by *Quackenbush et al.* ("*Quackenbush*"); Claims 2-3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush*; Claim 4 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush* in view of U.S. Patent Application Publ. No. US 2003/0056113 by *Korosec*; and Claims 6 and 7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush* in view of U.S. Patent No. 5,920,053 to *Debrouse*.

#### **IV. THE REJECTION OF THE CLAIMS**

##### **A. The Rejection of Claims 1-11 under 35 U.S.C. § 112, Second Paragraph**

Claims 1-11 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. In particular, the Examiner states that Claims 1-11 recite a system with no structural limitations and the claims recite use of active steps. Also, the Examiner states that the phrase “inter alia” renders Claims 8 and 9 indefinite. Claim 11 is rejected because it is an omnibus type claim that fails to point out what is included or excluded by the claim language.

In response, Applicants have amended claims 1, 8, 9, and 11. Amended claim 1 recites “A method for collecting luggage at a location remote from the airport for transporting in a secure manner to the airport of departure for further checking...” Claims 8 and 9 have been amended to no longer use the phrase “inter alia.” Claim 11 has been amended to point out what is included by the claim language.

Because the amendments described above are believed to overcome the rejection, Applicants respectfully request reconsideration and withdrawal of this rejection to the claims.

##### **B. The Rejection of Claims 1-11 under 35 U.S.C. § 101**

Claims 1-11 are rejected under 35 U.S.C. § 101 because the claims are drawn to a system but fail to recite any structural limitations of the system.

Claims 1-10 have been amended to recite a method. Claim 11 has been amended to recite structural limitations of a system.

Because the rejection is believed overcome by the amendments described above, Applicants respectfully request reconsideration and withdrawal of this rejection.

**C. The Rejection of Claims 1, 5, and 8-10 under 35 U.S.C. § 102**

Claims 1, 5, and 8-10 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Pub. No. 2007/0136075 by *Quackenbush et al.* ("*Quackenbush*"). The Examiner states that *Quackenbush* discloses the use of a system which performs the steps recited in Claims 1, 5, and 8-10.

Claims 1, 8, and 9 recite (in part) "...providing a passenger verification tag having three portions, each portion including, at least, passenger information, flight information, and a summary of security checks; detaching one portion of the three portions of the passenger verification tag; attaching the one portion to an item of luggage; attaching a passenger verification label to the photo ID in a tamper evident manner;..."

Applicants respectfully submit that *Quackenbush* does not disclose or suggest a tag having three portions or attaching a passenger verification label to a photo ID in a tamper evident manner. Instead, *Quackenbush* describes a scanable tag and bags being tagged with a radio frequency identification (RFID) tag in paragraph [0029]. *Quackenbush* does not disclose or suggest that the scanable tag or the RFID tag has three portions. Also, *Quackenbush* teaches that a confirmation number or other baggage identifier and later a baggage claim ticket are provided to the baggage owner in paragraph [0030]. *Quackenbush* does not teach or suggest a passenger verification label attached to a photo ID in a tamper evident manner. It is therefore respectfully submitted that independent Claims 1, 8, and 9 patentably distinguish over *Quackenbush*.

Likewise, it is respectfully submitted that dependent Claims 5 and 10 patentably distinguish over *Quackenbush* for at least the same reasons set forth with respect to Claims 1, 8, and 9. Thus, as *Quackenbush* fails to disclose or suggest the features of Claims 1, 5, and 8-10, it is respectfully requested that this rejection be withdrawn.

**D. The Rejection of Claims 2, 3, 4, 6, and 7 under 35 U.S.C. § 103**

Claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush*; Claim 4 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush* in view of U.S. Patent Application Pub. No. 2003/0056113 by *Koresec*; and Claims 6 and 7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Quackenbush* in view of U.S. Patent No. 5,920,053 to *Debrouse*.

As noted above, *Quackenbush* fails to disclose or suggest the features of claim 1, from which claims 2, 3, 4, 6, and 7 depend. Accordingly, Applicants respectfully submit that the outstanding Office Action has failed to provide a *prima facie* case of obviousness and respectfully request that this rejection be withdrawn.

**V. NEW CLAIMS**

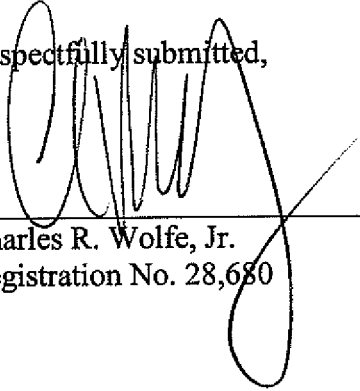
New Claims 12-24 are believed to patentably distinguish over the references of record, as they recite features not disclosed or suggested therein. Accordingly, it is respectfully submitted that Claims 12-24 are in condition for allowance.

**VI. CONCLUSION**

Consequently, in view of the present amendments and foregoing discussion, it is respectfully submitted that this application is in condition for allowance. An early and favorable action is therefore respectfully requested.

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Respectfully submitted,



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